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November 8, 2025

VIA ECF

The Honorable Leonard P. Stark
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801-3570

RE: Crystallex International Corporation v. Bolivarian Republic of Venezuela (No. 17-mc-151-LPS)

Dear Judge Stark:

Rusoro Mining Ltd. (“Rusoro”) writes to inform the Court that, yesterday at 4:42pm, it received notice that Gold Reserve Ltd. (“Gold Reserve”) has filed suit against Rusoro in the Court of Chancery of Delaware. The case is docketed as case number 2025-1292-LWW. The complaint and substantive papers were filed under seal, and the parties have not yet met and conferred to discuss the appropriateness of sealing (Rusoro does not believe that sealing is appropriate). Accordingly, in an abundance of caution, Rusoro has not attached the sealed documents. We do, however, attach for the Court’s consideration Gold Reserve’s non-sealed Supplemental Information Sheet stating that Gold Reserve is seeking “[p]reliminary and permanent injunctive relief to prevent Rusoro Mining from taking steps to close on impending purchase of the shares of PDV Holding.”

Rusoro does not, by this letter, seek relief; we are in the process of reviewing the papers and reserve all rights with respect to the newly-filed action. Rusoro thought it appropriate, however, to inform the Court of the filing of this action, which we believe was intended to (and does threaten to) undermine this Court’s jurisdiction over the sale process.

Respectfully submitted,

/s/ R. Craig Martin
R. Craig Martin

cc: Counsel of Record (via ECF)

**Supplemental Information Pursuant To Rule 6(b) of the Rules
of the Court of Chancery****Filed 11/08/25 3:22PM EST
Transaction ID 77729582
Case No. 2025-1292-**

The information contained herein is for use by the Court for statistical and administrative purposes. Nothing in this document shall be deemed binding for purposes of the merits of the case.

Case Caption: Gold Reserve Ltd. v. Rusoro Mining Ltd.**Date Filed:** 11/07/2025**Primary Case Type:** Breach of Contract**Case Statement:** Preliminary and permanent injunctive relief to prevent Rusoro Mining from taking steps to close on impending purchase of the shares of PDV Holding**Counsel for Plaintiffs - Counsel Members****Womble Bond Dickinson (US) LLP - Wilmington - 1313 North Market Street, Wilmington, DE 19801****First Name****Last Name**

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Subject Matter Jurisdiction - Relevant Statutes

- 10 Del. C. § 341

Expedited Proceeding

- Preliminary Injunction